

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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In Re:

MARK ANTHONY ANDREOTTIS, II a/k/a MARK
ANDREOTTI d/b/a PRAETORIAN INVESTOR
SERVICES,

Debtor.

Chapter: 7

Case No.: 17-15603 (JKS)

**DEBTOR'S APPLICATION IN SUPPORT OF ENTRY OF CONSENT
ORDER REQUIRING CHAPTER 7 DEBTOR, MARK ANTHONY
ANDREOTTIS (a.k.a. MARK ANDREOTTI) TO APPEAR FOR A
MANDATORY MEETING OF CREDITORS
PURSUANT TO 11 U.S.C. § 341(a)**

Carrie J. Boyle, the attorney for the Debtor ("Debtor's Counsel"), Mark Anthony Andreottis II (the "Debtor"), submits this application in support of the entry of a consent order in lieu of a motion pursuant to D.N.J. LBR 9012-1(b) requiring the Debtor to appear for a mandatory meeting of creditors pursuant to 11 U.S.C. § 341(a). In support thereof, Debtor's Counsel states the following:

1. On March 22, 2017, the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code. On June 26, 2017, the Debtor's case was converted to a chapter 11 case.
2. On November 1, 2017, the Debtor's case was converted to a chapter 7 case.
3. Charles Forman, Esquire was appointed the Chapter 7 Trustee (the "Trustee") on November 2, 2017.
4. The Debtor's meeting of creditors pursuant to 11 U.S.C. § 341(a) was scheduled

5. The Debtor went into Prison on October 13, 2017 and now resides at Lewisburg Federal Prison Camp in Lewisburg, PA.

6. Therefore, the Debtor has never been able to attend a sec. 341 (a) meeting of creditors.

7. Now, the Debtor through his counsel intends to schedule a sec. 341 (a) meeting of creditors from Lewisburg Prison Camp (“Camp”) and the Camp requires a court order to consider the Debtor’s request for a telephonic sec. 341 (a) meeting.

WHEREFORE, it is respectfully requested that the Court enter the Consent Order submitted herewith requiring the Debtor to appear for a mandatory meeting of creditors pursuant to 11 U.S.C. § 341(a) telephonically from Lewisburg Federal Prison Camp.

Respectfully submitted,

BOYLE & VALENTI LAW, P.C.

April 12, 2019

By: /s/Carrie J. Boyle

Carrie J. Boyle, Esquire
Boyle & Valenti Law, P.C.

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**CERTIFICATE OF CONSENT REGARDING CONSENT ORDER
REQUIRING CHAPTER 7 DEBTOR, MARK ANTHONY ANDREOTTIS
(a.k.a. MARK ANDREOTTI) TO APPEAR FOR A MANDATORY MEETING
OF CREDITORS PURSUANT TO 11 U.S.C. § 341(a)**

I hereby certify that with respect to the copy of the captioned Consent Order submitted to the Court, the following conditions have been met:

1. The terms of the copy of the consent order submitted to the Court are identical to those set forth in the original consent order.
2. The signatures represented by the /s/ on the copy of the consent order submitted to the Court reference the signatures of consenting parties obtained on the original consent order;
3. I will retain the original consent order for a period of seven years from the date of closing of the case or adversary proceeding.
4. I will make the original consent order available for inspection upon request of the Court or any party in interest; and
5. I will simultaneously electronically file this certification with the Court, by use of my login and password, thereby signing same for all purposes including those under Fed. R. Bankr. P. 9011.

Dated: April 12, 2019

/s/Carrie J. Boyle

Carrie J. Boyle, Esq.